REMARKS

The Office Action of February 14, 2006 was received and reviewed. The Examiner is thanked for reviewing this application. Reconsideration and withdrawal of the currently pending rejections are requested for the reasons advanced in detail below.

Claims 1-5 and 14-43 are pending for consideration. By this amendment, claims 1, 14, 19, 24, 31 and 38-42 have been amended. Consequently, claims 1-5 and 14-43 are pending, of which claims 1, 14, 19, 24 and 31 are independent.

In the detailed Office Action, the Examiner objected to claims 38-42 as containing the phrase "a the thermal radiation". Accordingly, Applicants have amended the claims, as suggested by the Examiner, to change the phrase to read as "a thermal radiation".

Claims 14, 15, 18, 19, 20, 23, 39 and 40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eida (U.S. Patent No. 6,633,121 – hereafter Eida) taken in view of Edwards (U.S. Patent No. 5,259,881 – hereafter Edwards) and Tanabe (U.S. Patent No. 6,132,280 – hereafter Tanabe) and taken in further view of Makiguchi (U.S. Patent No. 5,850,071 Makiguchi). Further, claims 16 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eida taken in view of Edwards and Tanabe, and taken in further view of Makiguchi, and taken in further view of Spahn (U.S. Patent No. 6,237,529 – hereafter Spahn) or Kamata (JP 11-229123 – hereafter Kamata). Still further, claims 17, 22, 24, 25, 27, 29-32, 34. 36, 37, 41 and 43 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eida (taken in view of Edwards and Tanabe, and taken in further view of Makiguchi, and taken in further view of Yamamoto (U.S. Patent No. 6,179,923 – hereafter Yamamoto). Still further, claims 28 and 35 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eida taken in view of Edwards and Tanabe, and taken in further view of Makiguchi and taken further in view of Yamamoto, and taken in further view of Spahn or Kamata. Still further, claims 24, 25, 31, 32, 41 and 42 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eida taken in view of Edwards and Tanabe, and taken in further view of Makiguchi, and taken in further view of Yamazaki (U.S. Publication No. 2001/0006827 – hereafter Yamazaki). Still further, claims 25, 26, 32 and 33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eida taken in view of Edwards and Tanabe and taken in further view of Makiguchi and in view of Yamazaki, and taken in further view of Yamada (U.S. Publication No. 20025/0076847 – hereafter Yamada) Bennett (U.S.

Patent No. 2,435,997 – hereafter Bennett) and/or Peng (U.S. Patent No. 6,641,674 – hereafter Peng). Still further, claims 1, 2, 4, 58, 38 and 43 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Yamazaki taken in view of Spahn and Van Slyke (U.S. Publication No. 2003/0101937 – hereafter Van Slyke) and taken further in view of Eida, Edwards and Makiguchi. Finally, claims 2 and 3 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Yamazaki taken in view of Spahn and Van Slyke and taken in further view of Eida, Edwards and Makiguchi, and taken in further view of Yamada, Bennett and/or Peng. These rejections are respectfully traversed at least for the reasons provided below.

With respect to the rejection on page 2, line 3 of the Office Action, particularly regarding the rejection of independent claims 14 and 19 over Eida taken in view of Edwards and Tanabe and taken in further view of Makiguchi, Applicants have amended independent claims 14 and 19 to recite the following additional features: "a first film formation chamber coupled to the transporting chamber through the loading chamber, wherein the first film formation chamber comprises a spin coater for forming a layer with a polymeric material". Support for the amended features can be found at least in, e.g., lines 7 to 19 on page 24, line 8 on page 25 to line 16 in page 26, and Fig. 1 in the specification.

Additionally, Applicants amended claims 14 and 19 to further recite "a first processing chamber coupled to the transporting chamber, wherein the first processing chamber is capable of generating a plasma for performing dry etching to remove a portion of the layer". Support for the amended features can be found at least in lines 7 to 19 on page 24, lines 12 to 17 on page 27 and Fig. 1 in the specification. Applicants respectfully assert that none of the cited prior art references teach, disclose or suggest these newly-added features in combination with the other recited features in claims 14 and 19 and their respective dependent claims.

According to the invention recited in amended claims 14 and 19, the present invention has an advantage in that it becomes possible to perform a dry etching to remove a lamination of organic compound, such as a polymeric material formed in unnecessary portions, and to remove moisture a vacuum heating in successive, in between formation of a film by a spin coating method and the formation of a film by an evaporation, whereby both electrical disconnection due to the lamination of organic compound formed in unnecessary portions such as terminal portions, and shrinkage due to moisture included in the lamination of

organic compound are prevented.

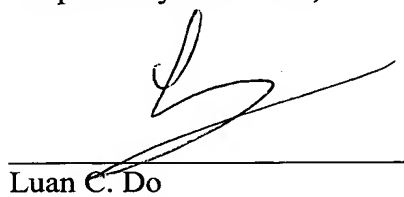
With respect to the rejection on page 4, line 21 of the Office Action, particularly with respect to the rejection of independent claims 24 and 31 over Eida taken in view of Edwards and Tanabe and taken in further view of Makiguchi, and taken in further view of Yamamoto, Applicants have amended independent claims 24 and 31 in a similar manner to claims 14 and 19. The arguments set forth above with respect to the rejection of independent claims 14 and 19 are also applicable to the rejection of independent claims 24 and 31 and their respective dependent claims. Moreover, Applicants respectfully assert that Yamamoto also does not teach, disclose or suggest the first and the second amended features.

Regarding the rejection on page 7, line 18 of the Office Action, wherein independent claim 1 is rejected over Yamazaki taken in view of Spahn and Van Slyke and taken in further view of Eida, Edwards and Makiguchi, Applicants have also amended independent claim 1 in a similar manner to claims 14 and 19. Accordingly, the arguments set forth above in relation to the rejection of claims 14 and 19 are also applicable to the rejection of independent claim 1. Moreover, Applicants respectfully assert that Spahn and Van Slyke do not teach, disclose or suggest the first and the second amended features.

Applicants note that the burden of establishing a *prima facie* case of obviousness under §103 lies with the Patent Office. In re Fine, 5 USPQ2d 1596 (Fed. Cir. 1988). To establish a *prima facie* case of obviousness, there must be (1) some suggestion or motivation (either in the references themselves or in the knowledge generally available to one of ordinary skill in the art) to modify the reference or to combine reference teachings to achieve the claimed invention and (2) the prior art must teach or suggest all the claim limitations. MPEP § 2143. Also, simply because the references could be does not mean that they should be. MPEP § 2143.01, citing In re Mills, 16 USPQ2d 1430 (Fed. Cir. 1990). Moreover, the claimed invention cannot be used as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious, In Re Fritsch, 23 USPQ2d 1780 (Fed. Cir. 1992). As the cited prior art references fail to teach, disclose or suggest the amended features in combination with the other cited features, the combination of the cited prior art references is improper in the pending obviousness rejections.

In view of the foregoing, it is respectfully requested that the obviousness rejections of record be reconsidered and withdrawn by the Examiner, that claims 1-5 and 14-43 be allowed and that the application be passed to issue. If a conference would expedite prosecution of the instant application, the Examiner is hereby invited to telephone the undersigned to arrange such a conference.

Respectfully submitted,



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